

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BRETT T. CULVER

Plaintiff,

v.

COMMONWEALTH OF PENNSYLVANIA,
et al.,

Defendants'

move to cl
PLAINTIFF'S RE-DIRECT OF
MOTION TO COMPEL DISCOVERYCase No. 1:cv-01-0904

(Judge Kane)

FILED
HARRISBURG, PA

OCT 22 2003

MARY E. D'ANDREA, CLERK
Per 218
Deputy ClerkPLAINTIFF'S RE-DIRECT MOTION PURSUANT
TO DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION TO COMPEL DISCOVERY

In the Defendants' Response dated 9-29-03, defendants' with counsel respond to the court that they are exempt from disclosing discovery in this case pursuant to the court closing discovery in the case. This plaintiff "however" never received any order from the court closing discovery, as the defendants consistently refuse to comply with the procedures in this case, through full manipulation of law and procedures by their professional attorney advantage over this unqualified plaintiff. This plaintiff can't even understand the Response argument submitted by defendants' and counsel.

The facts are that the defendants' through counsel refused to disclose all documentation and evidence of incidents of violations requested by the plaintiff in all discovery efforts. The defendants' through counsel instead submitted numerous documents of non-requested record, which is primarily this plaintiff's "own" personal documentations of various issues, of which this plaintiff never requested and already has. The defendants' through counsel continue playing these type games in all procedures, as the court allows this overwhelming advantage against this plaintiff.

CONCLUSION

Wherefore, this plaintiff Re-Directs his Motion to compel Defendants' to comply with Discovery, and disclose all record and evidence directly related to the issues/incidents in this case "as requested and required by law."

Dated: 10-15-03

Brett T Culver